MISSISSIPPI FARM BUREAU FEDERATION
POST OFFICE BOX 1972 • JACKSON, MISSISSIPPI 39215-1972 • 601-957-3200

September 6, 2000

Mississippi River/Gulf of Mexico Action Plan (4503F)
c/o U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington , DC 20460

Dear Sir:

The Mississippi Farm Bureau Federation, the state's largest general farm organization with more than 214,000 member families, appreciates the opportunity to review and offer comments on the Environmental Protection Agency's Draft Plan of Action for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico. A large portion of Mississippi's agricultural economy and most fertile soil is located within the Mississippi/Atchafalaya River Basin.

The Mississippi Farm Bureau Federation has concerns with the development of a federally designed and enforceable plan to control the frequency, size, duration, and degree of oxygen depletion of a hypoxic zone in the Northern Gulf of Mexico that is, for the most part, a naturally occurring phenomenon. While man and society may be contributing to the formation of the Gulf hypoxic zone, we feel to much emphasis has been placed on nutrients and agriculture as the culprit for creating and sustaining the Gulf hypoxic zone. Therefore, we do not support options 1.A or 1.B of the *Coastal Goal.*

A 20, 30, or 40% reduction of nitrogen loading is not practical or feasible for Mississippi. As mentioned earlier, a large portion of Mississippi's agricultural economy, particularly row crop agriculture, is located within the Mississippi/Atchafa'laya River Basin. Any mandatory reduction of farm inputs could be disastrous to our farming community. Actions on a state level are already being taken to reduce nutrient and sediment runoff. Producers are becoming more educated on water quality issues and, through voluntary, incentive-based, scientifically proven programs, are implementing farm-level best management practices.

We also cannot support option 1.C of the *Coastal Goal.* Your efforts to reduce perceived nutrient over-enrichment make no mention of a voluntary, incentive-based, non-regulatory, scientifically-sound manner to by which you plan to reduce and control Gulf hypoxia. Therefore, we suggest no further action at this time in designing a framework for a Gulf hypoxia action plan. We feel that by continuing the current actions, programs, and initiatives of the state and federal agencies, time will allow for new technologies and activities to take effect. Also, this time will allow for better and more comprehensive monitoring of the hypoxic zone to document reductions of nutrients, sediments, and the size of the hypoxic zone itself.

The adoption of an enforceable, numeric nutrient standard, a mandatory reduction of farm inputs, and an enforceable load allocation for tributaries will only set the stage for state to state conflicts and drive up compliance costs to the point that, without any cost assistance, some farming operations may give up and take their land out of production. Once an acre is taken out of production in the United States, an acre is put into production in another part of the world to offset the decrease in production here.

We ask that the Environmental Protection Agency and the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force not "fast-track" their decisions concerning this issue. We do not believe that all the possible options to address this issue have been thoroughly explored. The time-frame for the Plan's implementation actions is relatively short given the complexities involved with solving water quality problems. It has taken 28 years to reach the level of water quality we have now under the Clean Water Act. The Clean Water Act was primarily designed to regulate point sources of pollution. Yet, the Plan wishes to restore water quality to natural conditions throughout the basin in 3 to 5 years. Non-point source discharge is an unpredictable variable in the water quality equation. More federal, governmental control is not the answer.

The Plan calls for more participation in the Conservation Reserve Program (CRP) and the Wetlands Reserve Program (WRP). The CRP and WRP was originally designed to take environmentally-sensitive, highly-erodible soils out of production. Lately, the programs have been used to take high-yield producing lands out of production with land rental rates that compete directly with farmers. These programs should be operated based on their original ideals.

New farming technologies and techniques are allowing farmers to use fewer inputs and lower rates of inputs than in the past. We must allow modern farming practices to take effect to show that improvements in water quality are occurring. A federal Plan singling out a specific area of the country to address and control a situation to which there are no simple solutions is not an acceptable approach. The numerous laws, regulations, programs, initiatives, management partnerships, etc. currently in effect and being used on a state level should continue to be utilized. We feel that this is the best approach to controlling and reducing hypoxia in the Gulf of Mexico.

Sincerely,

Brent Bailey

Brent Bailey
Director, Natural and Environmental Resources